



shall be reviewable by only the Court and the Monitors but not the Monitors' staff; (3) any review of the Videos by the Court or the Monitors be conducted *in camera*; (4) any excerpts from, discussions of, or other materials derived from the Videos that are included in subsequent filings also be filed under seal; and (5) any discussion of the content of the Videos be held only in a closed courtroom.

Further, if the Court wishes to have a copy of the Videos provided to it, DFPS further requests that in addition to the above-listed five points, (1) the Court order DFPS to provide a copy of the Videos to the Court; (2) that if any Videos are filed with the Clerk of Court, that they be filed under seal; and (3) the Court maintain a single copy of the Videos and direct that no other copies of the Videos be made.

Respectfully Submitted,

/s/ Karl Neudorfer

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***Attorneys for Defendant Jaime Masters, in her official capacity as Commissioner of the Texas Department of Family and Protective Services***

**CERTIFICATE OF SERVICE**

I hereby certify that on March 29, 2022, a true and correct copy of the foregoing document has been served via e-service and/or email on all parties of record.

/s/ Karl Neudorfer  
KARL NEUDORFER